

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

JAMES ALLEN MILLER

Case: 2:21-mj-30459

Case No. Assigned To : Unassigned

Assign. Date : 9/28/2021

Description: CMP USA v. SEALED
MATTER (SO)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 2, 2018 in the county of Macomb in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. § 922(g)(3)

Offense Description

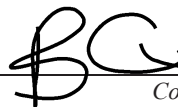
Unlawful user of a controlled substance in possession of a firearm

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: September 28, 2021City and state: Detroit, Michigan

Complainant's signature

Special Agent Brooke Cormier, FBI

Printed name and title

Judge's signature

Hon. Elizabeth Stafford, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Brooke Cormier, being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Special Agent with the Federal Bureau of Investigation (FBI) for approximately one year. Prior to my employment as a Special Agent I was employed as an analyst with the FBI for approximately twelve years. During my thirteen years employed with the FBI I have participated in violent crime investigations as both an analyst and as a Special Agent and am currently assigned to the FBI Macomb County Gang and Violent Crime task force primarily supporting violent gang and drug investigations.
2. I make this affidavit based upon personal knowledge and upon conversations with and communications from others who have personal knowledge of the events and circumstances described herein.

PURPOSE OF AFFIDAVIT

3. This affidavit is in support of a complaint and arrest warrant for JAMES ALLEN MILLER. This affidavit is being submitted for the limited purpose of establishing probable cause, therefore I have not included each and every fact related to MILLER. Rather, I have set forth only the facts necessary to establish probable cause that JAMES ALLEN MILLER violated Title 18,

Unites States Code Section 922(g)(3)- being an unlawful user of a controlled substance in possession of a firearm

4. On July 25, 2018, United States Magistrate Judge ELIZABETH A. STAFFORD authorized an arrest warrant and complaint charging MILLER with Conspiracy to Manufacture and Distribute Methamphetamine in violation of Title 21, United States Code Section 841 and 846. This complaint was related to the on-going investigation of the Vigilantes Motorcycle Gang (VMG) and their involvement in the manufacturing and distribution of meth.

PROBABLE CAUSE

5. Affiant is aware that MILLER, was a member of the Liberty-Riders Motorcycle Gang (LRMG), at the time of this investigation, and was a former member of the VMG. MILLER is a long-time member of the Outlaw Motorcycle Gang community.
6. On August 2nd, 2018, pursuant to this warrant, Agents from the FBI and Task Force Officers proceeded to MILLER'S home at *****, Gratiot, Lot ***, Roseville, Michigan.
7. During the course of arresting MILLER, firearms were observed in plain view. MILLER provided Agents a written consent to search this location.

8. This search located nine firearms, to include, two loaded Franci-Brescia Shotguns, a loaded Ithaca Shotgun, a 22 caliber Marlin rifle, a 30/30 Marlin rifle, a loaded Rohm 22 caliber revolver, a J Stevens Shotgun, a Savage Shotgun, and a Hamilton 22 caliber revolver.
9. In addition, a camouflage bag was located that contained several hundred rounds of ammunition for both shotguns and handguns. Handgun magazines, a loaded assault weapon magazine, and more miscellaneous ammunition was also located and seized.
10. In a kitchen cabinet, small plastic bags commonly used to package drugs, an empty box for a small scale, and a small scale were located, in close proximity to an NRA card for MILLER. In affiant's training and experience as well as the training and experience of other investigators assigned to the investigation, all of those items are typically used to weigh, package, and distribute drugs.
11. In a different kitchen cabinet, a plate was located that contained a pen tube with white residue, a business card with a white residue, and a "green dot" card with white residue. In affiant's training and experience as well as the training and experience of other investigators assigned to the investigation, these items are used to prepare and use drugs.

12. Finally, a “WD-40” can with a false bottom was located in a kitchen cabinet below the sink. In affiant’s training and experience as well as the training and experience of other investigators assigned to the investigation, these false bottom containers are frequently used to hold contraband, to include, drugs.
13. The items listed in paragraph 11 were sent to the DEA Laboratory for analysis. The white residue was determined to be cocaine.
14. I am aware that the firearms listed in paragraph 8, found by law enforcement during the consent search at the home of MILLER were not manufactured within the state of Michigan.

CONCLUSION

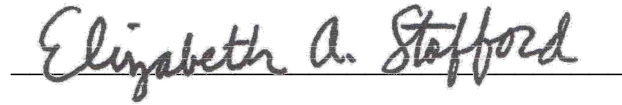
15. Based upon the above investigation, probable cause exists that JAMES ALLEN MILLER- a person who is an unlawful user of or addicted to a controlled-substance-possessed a firearm that had previously travelled in interstate commerce, in violation of Title 18, United States Code Section 922(g)(3).

A handwritten signature in black ink, appearing to be 'BC' followed by a long horizontal line.

Special Agent Brooke Cormier

Federal Bureau of Investigation

Subscribed and sworn before me or
by reliable electronic means.

A handwritten signature in cursive script, reading "Elizabeth A. Stafford", is written over a horizontal line.

ELIZABETH STAFFORD

UNITED STATES MAGISTRATE JUDGE

Dated: September 28, 2021